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December 15, 2005

VIA HAND DELIVERY

The Honorable Charles L. A. Terreni
Chief Clerk and Administrator
The Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, South Carolina 29210

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2005 DEC 15 AM 11:57
SC PUBLIC SERVICE
COMMISSION

RE: Docket No: 2005-354-A, Revisions to Article 8 of the Public Service Commission
of South Carolina (Commission's) Regulations

Dear Mr. Terreni:

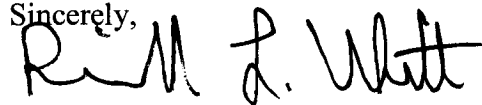
Duke Power, a division of Duke Energy Corporation ("Duke"), through counsel, hereby provides comments relevant to the above referenced matter:

1. **Re: Section 103-805.** We agree with the Commission's proposal to remove this regulation.
2. **Re: Protestants.** We agree with the suggestion from other participants that procedures related to protestants be modified to insure fairness to applicants, and prevent "ambushes" by protestants.
3. **Re: Intervenors.** We suggest that the definition of intervenor and the standard for intervention be clarified. Specifically, we suggest that an intervenor be required to state, with specificity, their claimed connection to the subject matter of the proceeding, and how the proceeding will have a material impact upon the intervenor.

If you have any questions or concerns please do not hesitate to contact the undersigned

With kind regards, we are

Sincerely,



William F. Austin
Richard L. Whitt

CC: See the attached Certificate of Service

CERTIFICATE OF SERVICE

I, Darla Stone, employee of Austin Lewis Rogers, P.A., hereby certify that I caused copies of Duke Power, a division of Duke Energy Corporation's comments to be mailed on this date, to the individuals shown below, at the addresses shown below, with sufficient postage attached:

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This the 15th day of December, 2005.

Austin Lewis and Rogers, P.A.

By: Darla S. Stone
Darla S. Stone